

UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE UNITED STATES TRUSTEE
ANDREW R. VARA
ACTING UNITED STATES TRUSTEE, REGION 3
Jeffrey M. Sponder, Esquire
One Newark Center, Suite 2100
Newark, NJ 07102
Telephone: (973) 645-3014
Facsimile: (973) 645-5993
Email: jeffrey.m.sponder@usdoj.gov

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

	:	Case No. 18-33676 (JKS)
In re	:	Chapter 7
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	:	
Volvic A. Chaperon,	:	The Honorable John K. Sherwood
	:	
	:	
Debtor.	:	
	:	

**APPLICATION FOR THE ENTRY OF A CONSENT ORDER EXTENDING TIME TO
FILE A MOTION TO DISMISS CASE UNDER 11 U.S.C. § 707(b)(1) AND (3) AND
EXTENDING TIME TO FILE A COMPLAINT OBJECTING TO DISCHARGE UNDER
11 U.S.C. § 727**

The Acting United States Trustee (“U.S. Trustee”), by and through counsel, in furtherance of his duties and responsibilities under 28 U.S.C. §§ 586(a)(3) and (5), hereby respectfully submits this Application for the entry of the *Consent Order Extending Time to File a Motion to Dismiss Case Under 11 U.S.C. §§ 707(b)(1) and (3) and Extending Time to File a Complaint Objecting to Discharge Under 11 U.S.C. § 727*.

1. In support of this Application, the U.S. Trustee respectfully represents as follows: The docket for this case reflects that on November 30, 2018, Volvic A. Chaperon (“Debtor”) filed a

voluntary petition for relief under chapter 7 of title 11 of the United States Code (“Bankruptcy Code”).

2. The docket also reflects that a meeting of creditors pursuant to 11 U.S.C. § 341(a) was held on January 7, 2019.

3. The U.S. Trustee is conducting an independent review of the Debtor’s case warranting further investigation.

4. The U.S. Trustee and Debtor’s counsel have agreed to an informal meeting with the Debtor and his spouse.

5. The Debtor is cooperating and the investigation is ongoing.

6. Unless the consent order is entered, the Debtor will automatically be issued a discharge upon expiration of the current November 19, 2019, deadline, before the U.S. Trustee completes its investigation. As a result, the U.S. Trustee respectfully requests that the Court enter the Consent Order and extend the deadline for filing a motion to dismiss under 11 U.S.C. §§ 707(b)(1) and (3) or a complaint objecting to discharge under 11 U.S.C. § 727, to January 22, 2020, as agreed to by the Debtor.

7. The U.S. Trustee reserves his rights to seek any additional extensions of time for good cause shown.

Respectfully submitted,
ANDREW R. VARA
ACTING UNITED STATES TRUSTEE
REGION 3

By: /s/ Jeffrey M. Sponder
Jeffrey M. Sponder
Trial Attorney

DATED: November 19, 2019